IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA V.	: : :	CRIMINAL NUMBER 17-549-1
PETER GOODCHILD	; ;	
	ORDE	<u> </u>
AND NOW, this	day of	, 2017, upon consideration
Defendant's Unopposed Motion for Continuance of Trial Date, it is hereby ORDERED to		

Defendant's Unopposed Motion for Continuance of Trial Date, it is hereby **ORDERED** that the motion is **GRANTED**. The Court finds that the parties need additional time to determine whether a non-trial disposition can be negotiated and if not the defense needs more time to prepare for trial. Pursuant to 18 U.S.C. § 3161(h)(7), the Court finds that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Trial in this matter shall begin on the day of , . . .

BY THE COURT:

HONORABLE GERALD A. McHUGH

of the

United States District Court Judge

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

:

V. : CRIMINAL NUMBER 17-549-1

:

;

PETER GOODCHILD

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL DATE

Peter Goodchild, by his counsel undersigned, respectfully requests a brief continuance of trial in this case. In support of this request, it is stated:

- 1. On October 19, 2017, Mr. Goodchild was arraigned before The Honorable Richard A. Lloret and entered a plea of not guilty to the instant indictment.
 - 2. The trial is scheduled to begin on December 18, 2017.
- 3. The defense has received voluminous discovery in this case. Additional time is needed to review the discovery materials with Mr. Goodchild, conduct any necessary investigation and legal research, determine if a non-trial disposition is possible, and otherwise prepare for trial. A continuance of not less than ninety (90) days is respectfully requested.
- 4. Assistant United States Attorney Anita D. Eve has no objection to this continuance motion.
- 5. Defense counsel stipulates that the time from the filing of this motion until the trial date is excludable time pursuant to 18 U.S.C. § 3161(h)(7).
- 6. Attached hereto is Mr. Goodchild's written consent waiving his speedy trial rights in this matter.

WHEREFORE, for the foregoing reasons, the defense respectfully requests that this motion be granted.

Respectfully submitted,

/s/ Felicia Sarner FELICIA SARNER Assistant Federal Defender **CERTIFICATE OF SERVICE**

I, Felicia Sarner, Assistant Federal Defender, Federal Community Defender Office for the

Eastern District of Pennsylvania, hereby certify that I have electronically filed and served a copy

of the Defendant's Unopposed Motion for Continuance of Trial Date, by electronic notification

and/or hand delivery to her office, upon Anita D. Eve, Assistant United States Attorney, office

located at 615 Chestnut Street, Suite 1250, Philadelphia, Pennsylvania 19106.

/s/ Felicia Sarner

FELICIA SARNER

Assistant Federal Defender

DATE:

December 6, 2017